

ANDERSON EXHIBIT 21

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL INDUSTRY)	MDL 1456
AVERAGE WHOLESAL PRICE)	Civil Action No: 01-12257-PBS
LITIGATION)	
)	Hon. Patti Saris
)	
THIS DOCUMENT RELATES TO)	
UNITES STATES OF AMERICA, ex rel.)	
VEN-A-CARE OF THE FLORIDA KEYS,)	
INC. v. ABBOTT LABORATORIES, INC.,)	
No. 07-CV-11618-PBS)	

PLAINTIFFS' RULE 26(a)(1) DISCLOSURES

Ven-A-Care of the Florida Keys, Inc. ("Relator") for itself and on behalf of the United States, hereby provides its Rule 26(a)(1) Disclosures:

A. Witness Disclosures

The individuals identified on the attached **Exhibit A** may have discoverable information that the Relator may use to support the claims in this case.¹ **Exhibit A** also identifies generally the subject matter upon which the identified individuals may be knowledgeable. If an identified individual is an employee of a corporate entity, the United States, or a state, the information that each may provide may be subject to the approval of their employer and/or counsel representing that employer. Relator reserves

¹To the extent that any document covered by Section B of these disclosures identifies additional persons not named herein who the Plaintiffs later determine may have information supporting their claims, the names of those persons are incorporated in this initial disclosure.

the right to call any witness or use testimony of any witness deposed in the case or otherwise identified in writing.

All contact and/or deposition scheduling of employees of the Government and the Relator identified herein should be coordinated through counsel for the Relator.

B. Document Disclosures

The Relator and the United States have identified and produced documents in *United States of America, ex rel Ven-a-Care of the Florida Keys, Inc. v. Abbott Laboratories, Inc.*, Civil Action No. 06-CV-11337-PBS that may be used to support the claims in this case. Relator's production encompasses all of Relator's unprivileged documents which pertain to Abbott. Abbott has produced documents in *The State of Texas ex rel Ven-a-Care of the Florida Keys, Inc. v. Abbott Laboratories, Inc.*, Cause No. D-1-GV-04-001286 to Relator that may be used to support claims in this case.

The Relator also reserves the right to supplement the foregoing identified documents and witnesses.

The Relator also reserves the right to assert objections as to the admissibility of any identified or produced documents.

C. Damages

The Relator seeks the recovery of damages to the Medicaid program arising from Abbott's unlawful conduct. Abbott has not yet fully produced complete pricing and transaction data that is essential to identifying and understanding the amount of the United State's damages. Until then, the Relator will be unable to complete its damages analyses. The Relator will refine its damage calculations as it obtains and analyzes

relevant information from Abbott through discovery and reserves its rights to fully amend and supplement this disclosure as necessary.

As a general matter, based on the information currently in our possession, please be advised of the following:

1. Damages calculations will cover Medicaid damages for the years 1994 through the present;
2. Damages calculations will include the federal portion of the damages inflicted by Abbott upon each state Medicaid program and will not include the state portion.
3. Damages calculations will not include the inflated co-pays or deductibles, if any, paid by Medicaid recipients;
4. Damages calculations will not include monies paid by Medicaid Programs as dispensing fees;
5. The damages suffered in connection with Medicaid are not reduced by any amount paid under the Medicaid Rebate Program (the "Rebate Program") mandated by the Federal Omnibus Budget Reconciliation Act of 1990 ("OBRA '90"). The amount of the rebates paid under that program are unaffected by the reimbursement amounts, and are calculated by reference to the Average Manufacturer Price and the Best Price, and the other factors specified in the statute itself, which are independent of the reimbursement amount.

Damages will be calculated based upon the traditional approach of calculating the difference between the actual amounts reimbursed as compared to the estimate of the amounts that would have been reimbursed in the absence of the false statements or

claims caused by Abbott. The measure of the damages under the False Claims Act is the amount that it paid out by reason of the false statements over and above what it would have paid if the claims had been truthful. *United States v. Killough*, 848 F.2d 1523, 1532 (11th Cir. 1988); *United States v. Woodbury*, 359 F.2d 370, 379 (9th Cir. 1966). "A court should ask the question, 'How much would the government have paid for the item at issue 'but for' the fraudulent actions of the defendant?'" *United States ex rel. Roby v. Boeing Co.*, 79 F. Supp. 877 (S.D. Ohio 1999). "[T]he measure of the government's damages would be the amount that it paid out by reason of the false [claims] over and above what it would have paid if the claims had been truthful." *BMY Combat Systems v. United States*, 44 Fed. Cl. 141, 147 (Ct. Cl. 1999)(quoting *Woodbury*, 359 F.2d at 379). Moreover, there is "no set formula for determining the government's actual damages [under the False Claims Act]." *United States v. Killough*, 848 F.2d at 1532. "[D]amages under the FCA are to be determined in a flexible manner to ensure proper recovery of direct, and not consequential, damages resulting from the making of a false claim." *BMY-Combat Systems Division of Harsco Corporation v. United States*, 44 Fed.Cl. 141, 148. Damages do not need to be precisely determined. *United States v. American Packing Corp.*, 113 F. Supp. 223, 224 (D.C.N.J. 1953).

One approach to calculating damages under this methodology will be based upon what is called the tainted claims theory. Under this theory, the Relator, on behalf of the United States, will seek to recover 100% of the amounts paid by Medicaid in any situation in which the reimbursement amount was based upon a false statement or claim which Abbott caused to be submitted through its dissemination of inflated price information. Abbott knowingly used the spread as an unlawful inducement in violation

of the federal anti-kickback statute, causing resulting false and fraudulent claims to be submitted. Thus, the total amount of the payment represents damages.

An alternative method of calculating damages will be to estimate the amount that would have been reimbursed for the Drugs (as identified in the Complaint; see p. 12) had Abbott not reported inflated prices. The details of this calculation are based upon Abbott transactional data. The Relator will identify a range of prices Abbott knew were generally and currently paid in the marketplace for its products. The Relator will then estimate AWP prices that would have been published with, and based upon, prices paid to Abbott by its customers within wholesaler and pharmacy classes of trade. This estimation will be founded upon known "mark-ups" or formulas used in the setting and publication of AWP information.² The Relator will then estimate the amounts that would have been reimbursed to providers, including pharmacies, using the price information that was not false. The Relator will then calculate the difference between the actual amounts reimbursed as compared to its estimate of the amounts that would have been reimbursed to providers using the price information that was not false. At the current time, these calculations are expected to be conducted on a quarter by quarter basis.

In most instances, state Medicaid programs reimbursed pharmacies for drugs dispensed to Medicaid patients based upon reimbursement methodologies utilizing a "lesser of" component in the formula. For instance, the "lesser of" (a) ceiling prices such as Maximum Allowable Costs or Federal Upper Limits or (b) the Estimated Acquisition Cost ("EAC") constitutes the basis for reimbursement. In these situations, if the Abbott pricing information that was not false would have resulted in an EAC lower

² For instance, Abbott PPD personnel knew AWP prices were published at a 25% markup above the Drugs' respective published wholesale prices.

than the reimbursement actually paid, then damages will be calculated. If the Abbott pricing that was not false would not have resulted in an EAC lower than a MAC, for instance, then no damages will be calculated.

The Relator will factor in patient co-pays, if any.

The Relator will also segregate and claim only the federally funded share of the Medicaid program damages.

The applicable state Medicaid Program dispensing fee, or an estimate thereof, will first be deducted before calculating any damages amount.

Calculations, as set forth above conceptually, will be done for each NDC, for each state, for each quarter from 1994 through the present. The sum total of those calculations will represent the total Medicaid damages sought by the Relator in this case under this alternative damage methodology.

Lastly, the Relator seeks treble the amount of actual damages under the False Claims Act, plus penalties of between \$5,000/\$5,500 and \$10,000/\$11,000 for each false statement or claim submitted or caused to be submitted by Abbott to Medicaid.

DATED: August 27 2008

Respectfully Submitted

/s/: Jarrett Anderson

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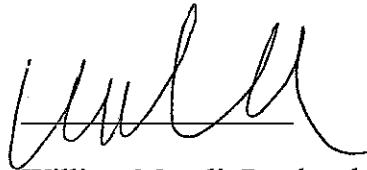
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ATTORNEYS FOR VEN-A-CARE OF THE FLORIDA KEYS, INC.

CERTIFICATE OF SERVICE

I do hereby certify that the foregoing PLAINTIFFS' RULE 26(a)(1) DISCLOSURES upon all parties via ECF and via Lexis Nexis File and Serve on the 27th day of August 2008.

A handwritten signature in black ink, appearing to read 'William Mecoli', is written over a horizontal line.

William Mecoli, Paralegal.

** Relator notes Defendant is on notice of past and planned state Medicaid discovery and depositions.

*** Relator reserves its rights to disclose the identities of records custodians of state Medicaid programs, as necessary.

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Alaska DHSS American Association for Homecare (AAH)		Industry/Trade Group	Tyler Wilson President 2011 Crystal Drive Suite 725 Arlington, VA 22202 (703) 836-6263	Abbott's membership in and/or financial support of this organization, and analysis, discussion or communications pertaining to price reporting, collection and reliability, communications with federal and state legislatures/legislators, and agencies, training regarding Medicare, Medicaid, AWP, drug payment, and communications related to drug marketing on behalf of manufacturers, such as Abbott
American Society of Clinical Oncology (ASCO)		Industry/Trade Group	1900 Duke Street Suite 200 Alexandria, VA 22314 Contact through counsel: Hanoi Veras London & Mead (202) 331-3334 x 4	Abbott's membership in and/or financial support of this organization, and analysis, discussion or communications pertaining to price reporting, collection and reliability, communications with federal and state legislatures/legislators, and agencies, training regarding Medicare, Medicaid, AWP, drug payment, and communications related to drug marketing on behalf of manufacturers, such as Abbott

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Apria Healthcare		Abbott Customer	Corporate Headquarters Apria 26220 Enterprise Court Lake Forest, CA 92630 Raoul Smyth VP & Assoc. GC (949) 639-2018 C/o National Registered Agents, Inc. 2030 Main Street, Suite 1030 Irvine, CA 92614	Abbott's sales practices and efforts to market the spread on drugs; policies and practices regarding drug purchases and payment
Arkansas DHS				
Arnold	Donna	Abbott, Analyst, Strategic Pricing (also known as Pricing and Contracting)	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers
Arnold	Jeff	Formerly associated with Omnicare and Gerimed	c/o C. Dean Furman Furman & Nielsen 4801 Outer Loop, Suite A-129 Louisville, KY 40219	Policies and practices of a group purchasing organization; Abbott's sales practices and efforts to market the spread on drugs

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Bahr (and/or another representative)	Debra	Formerly Kentucky Medicaid Pharmacy Director	<p>Debra Bahr 3561 Hunters Green Way Lexington, KY 40509 (859) 263-7314</p> <p>To be contacted through counsel: Paula J. Holbrook, Esq. Assistant Attorney General Medicaid Fraud Abuse and Control Division Office of the Attorney General 1024 Capitol Center Drive, Suite 200 Frankfort, Kentucky 40601 (502) 696-5503 (502) 573-7150 facsimile</p>	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Bassano	Amy	Supervisory Health Insurance Specialist, Center for Medicare Management, Hospital & Ambulatory Policy Group, Division of Ambulatory Services	7500 Security Boulevard Baltimore, MD 21244 410-786-3000	Medicare Part B payment for drugs, including federal statutory and regulatory payment requirements, and Medicare payment methodologies using average wholesale prices

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Batezel	Douglas E.	Amerisource Bergen Corporation	c/o J. David Bickham, Jr. Vinson & Elkins 2801 Via Fortuna, Suite 100 Austin, TX 78746-7568 (512) 542 - 8570	ABC is one of three large national wholesalers. ABC is knowledgeable of the pricing, distribution and marketing of pharmaceutical products; interplay and market dynamics between wholesalers and drug manufacturers; process for servicing accounts between manufacturers and customers who have contractual relationships
Bien	Timothy E.	Omnicare, Inc.	c/o Eamon O'Kelley Dewey & LeBouef LLP 1301 Avenue of the Americas New York, NY 10019-6092 (212) 259-8000	Policies and practices of a group purchasing organization; Abbott's sales practices and efforts to market the spread on drugs
Booth	Charles	Former Director of Payment Policy, CMS	Charles R. Booth 8024 Ridgely Oak Road Baltimore, MD Contact counsel for the United States: Justin Draycott, Esq. (202) 305-9300	Medicaid payment for drugs and federal statutory and regulatory payment requirements
Brown	Pearl	Team Leader, Division of Payment Management, Office of Assistant Secretary for Adiminstration and Management, Dept. of HHS.	Dept. HHS 11400 Rockville Pike Rockwall Building #1, Suite 700 Rockville, MD 20852 Contact DOJ Counsel: George Henderson (617) 748-3272	The Federal Payment Management System, or "SmartLink" system used by State Medicaid agency recipients to receive the federal share of state Medicaid expenditures; procedures relating to the payment of federal monies to State Medicaid agencies; the Form PSC-272; certifications of requests to HHS for payment of the federal share

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Buto	Kathleen	Former Associate Administrator for Policy, CMS	<p>Kathleen Buto 1350 I Street, N.W. Suite 1210 Washington, DC</p> <p>Contact counsel for the United States: Justin Draycott, Esq. (202) 305-9300</p>	Medicare payment for drugs, and federal statutory and regulatory payment requirements
Cathers, Pharm. D., R.Ph. (and/or another representative)	Terri	Director of Pharmacy, Office of Medical Assistance Programs, Pennsylvania	<p>Terri Cathers, Pharm.D., R.Ph. Director of Pharmacy Office of Medical Assistance Programs 49 Beech Drive Harrisburg, PA 17110-3591 Phone: 717-346-8156 c- tcathers@state.pa.us</p> <p>Contact Counsel at Pennsylvania State AG: Pennsylvania Office of Attorney General 16th Floor Strawberry Square Harrisburg, PA 17120 (717) 787-3391</p>	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels

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Chadwick	Kathleen M.	First Data Bank, Inc.	c/o John Kern Manatt Phelps Phillips, LLP 1111 Bayhill Dr., Suite 300 San Bruno, CA 94066- 3053 (650) 812 -1317	Pricing practices and policies; Abbott's price representations and reporting that were ultimately used by state Medicaid agencies to set payment levels
Christopher	Michelle	Formerly with Medi-Span, Inc.	12761 Eagle Pointe Circle Fort Myers, FL 33913	Pricing practices and policies; Abbott's price representations and reporting that were ultimately used by state Medicaid agencies to set payment levels
Cicerale	Jerrie	Abbott Contract Marketing for Hospital Products Division	Home address: 7914 17th Avenue Kenosha, WI 53143 Contact through counsel: Dave Stetler dstetler@stetlerandduffy.com 312-338-0202 11 S. La Salle, Ste 1200 Chicago, IL 60603	Drug pricing including price setting and reporting; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits

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Cioppa (and/or another representative)	Carl	Manager Formulary Operations and Systems Interface, Office of Health Insurance Programs, Bureau of Pharmacy Policy and Operations, New York	<p>Carl Cioppa Manager Formulary Operations and Systems Interface Office of Health Insurance Programs Bureau of Pharmacy Policy and Operations 99 Washington Ave., Suite 720 Albany, NY 12210-2806 (518) 473-5451, or 518-486-3209 (secretary) ctc02@health.state.ny.us</p> <p>To be contacted through counsel: Gregor N. Macmillan Director, Bureau of Health Insurance Programs Division of Legal Affairs New York State Department of Health Corning Tower -- 24th floor Empire State Plaza Albany, NY</p>	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Colorado DHCPF				
Coram Health Care		Abbott Customer	<p>Michael Dell Gen. Counsel (303) 672-8738 1675 Broadway, Suite 900 Denver, CO 80202</p>	Abbott's sales practices and efforts to market the spread on drugs; policies and practices regarding drug purchases and payment

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Covance, Inc.		Consultant	Joseph Herring, Chairman & CEO 210 Carnegie Center Princeton, NJ 08540 (609) 452-4440	Abbott's knowledge of Medicare and Medicaid payment; Abbott lobbying activities
CVS		Abbott Customer	CVS Corporate Headquarters One CVS Drive Woonsocket, RI 02895	Abbott's sales practices and efforts to market the spread on drugs; policies and practices regarding drug purchases and payment
Dempsey	Bill	Abbott Current Senior Vice President Pharmaceutical Operations Former General Manager Alternate Site Product Sales	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Operations of Hospital Products Division, Home Infusion Services; contracting and marketing including market research, sales and customer service; drug pricing including price setting and reporting; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers
DeParle	Nancy Ann	Former CMS Administrator	Nancy Ann DeParle 4229 Leland Street Chevy Chase, MD 20815 Contact through counsel for the United States: Justin Draycott, Esq. (202) 305-9300	Medicare and Medicaid payment for drugs and federal statutory and regulatory payment requirements

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DeYoung	Debra	Abbott Strategic Pricing Manager	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064- 3500 Telephone: (847) 937- 6100	Contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers; importance of Medicare or Medicaid payment to Abbott drugs.
Donnelly (and/or another representative)	James	Office of Health Insurance Programs, Bureau of Pharmacy Policy and Operations, New York	James Donnelly Office of Health Insurance Programs Bureau of Pharmacy Policy and Operations 99 Washington Ave., Suite 720 Albany, NY 12210- 2806 (518) 257-4554 To be contacted through counsel: Gregor N. Macmillan Director, Bureau of Health Insurance Programs Division of Legal Affairs New York State Department of Health Coming Tower -- 24th floor Empire State Plaza Albany, NY 12238 gnm01@health.state.n y.us 518-408-1495	Processing of Medicaid claims for payment; reliance and use of reported AWP and/or WAC prices; the state's Medicaid claims data

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Duane Reade		Abbott Customer	Duane Reade Corporate Headquarters 440 Ninth Avenue New York, NY 10022	Abbott's sales practices and efforts to market the spread on drugs; policies and practices regarding drug purchases and payment
Duzor	Deirdre	Director, Center for Medicaid & State Operations, Disabled & Elderly Health Programs Group, Division of Pharmacy	7500 Security Boulevard Baltimore, MD 21244 410-786-3000	Medicaid payment for drugs, including the Medicaid Drug Rebate Program, and federal statutory and regulatory payment requirements
Dyer	Scot	McKesson Corporation	c/o Carrie Valiant Epstein, Becker & Green, PC 1227 25th St. NW # 700 Washington, D.C. 20037 (202) 861 - 0900	Industry practices, including information relating the prices for Defendants' products that are currently and generally available in the market place
Edelstein	Ed	First Data Bank, Inc.	1111 Bayhill Dr., Suite 300 San Bruno, CA 94066-3053 (650) 812 - 1317	Pricing practices and policies; Abbott's price representations and reporting that were ultimately used by state Medicaid agencies to set payment levels
Eichhorn	Gerald	Abbott Former National Account Manager and Managed Care Analyst	Home address: 916 S. Dymond Road Libertyville, IL 60048-3532 847-549-7721	Commercial business development; accounts management; drug pricing including price setting and reporting; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits; involved in analysis of Vancomycin pricing decrease and subsequent increase around 1995; also involved in pricing of PPD products

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Fiske	Joseph	Abbott Corporate Representative	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Corporate structure including organization of and relationship between Abbott Laboratories and Abbott Laboratories, Inc; the PPD departments' responsibilities for pricing, sales and marketing including PPD's efforts regarding competitive pricing information; importance of Medicare or Medicaid payment to Abbott drugs; importance of Medicaid payment to customers; drug pricing including price setting and reporting, PPD list prices and PPD communications with Red Book, First Data Bank and Medi-Span; competitor pricing; Drug payment process; arrangement between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits; contracting and marketing including marketing research, sales and customer service
Garvin	Beth	Abbott, Analyst, Strategic Pricing (also known as Pricing and Contracting)	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers

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Generic Pharmaceutical Industry Association (GPhA)		Industry/Trade Group	Generic Pharmaceutical Industry Association Corporate Headquarters 2300 Clarendon Blvd. Suite 400 Arlington, VA 22201 Contact through counsel: Ray Aragon McKenna, Long and Aldri (202) 496-7530	Abbott's membership in and/or financial support of this organization, and analysis, discussion or communications pertaining to price reporting, collection and reliability, communications with federal and state legislatures/legislators, and agencies, training regarding Medicare, Medicaid, AWP, drug payment, and communications related to drug marketing on behalf of manufacturers, such as Abbott
Georgia DCH				
Gerzel	April	Abbott, Analyst, Strategic Pricing (also known as Pricing and Contracting)	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers

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Gilmore (and/or another representative)	Gary	Mass Health, Deputy Director of Pharmacy	<p>Deputy Director of Pharmacy MassHealth 600 Washington Street Boston, MA 02111</p> <p>To be contacted through counsel: Richard Heidlage Assistant Attorney General Medicaid Fraud Control Unit Office of the Attorney General Commonwealth of Massachusetts One Ashburton Place Boston, MA 02108 (617) 727-2200 Ex. 2381 Richard.Heidlage@ag.o.state.ma.us</p>	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Glover	Scott	Abbott Sales Management	<p>Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100</p>	Commercial business development; Contracting and marketing including marketing research, sales and customer service

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Gonzalez	Richard	Abbott - Former President	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	The circumstances surrounding Abbott's receipt of the October 31, 2000 Congressman Stark letter and Abbott's subsequent price change decision on the subject drugs
Gorospe (and/or another representative)	Kevin	California State Medicaid	California Department of Health Care Services 1501 Capitol Avenue Sacramento, CA 95814 (916) 552-9606 To be contacted through AG Counsel: Nicholas Paul (619) 688-6099	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Gutgesell	Kathy	First Data Bank, Inc.	c/o John Kern Manatt Phelps Phillips, LLP 1111 Bayhill Dr., Suite 300 San Bruno, CA 94066-3053 (650) 812 - 1317	Pricing practices and policies; Abbott's price representations and reporting that were ultimately used by state Medicaid agencies to set payment levels

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Hazelwood (and/or another representative)	Marvin	Former Illinois State Medicaid Pharmacy Manager	<p>Marvin Hazelwood 1812 S. Cog Mill Ct. Springfield, IL 62704 (217) 787-6252</p> <p>To be contacted through AG Counsel: Brent Stratton Assistant Chief Deputy A.G. 100 West Randolph Street Chicago, IL 60601 (312) 814-3000</p>	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Heggie	Michael	Abbott Reimbursement Manager	<p>Home address: 1229 Notchbrook Road Stowe, VT 05672 Contact through counsel: Dave Stetler dstetler@stetlerandduffy.com 312-338-0202 11 S. La Salle, Ste 1200 Chicago, IL 60603</p>	Drug pricing including price setting and reporting; drug reimbursement; Abbott's corporate-wide use of Medicare and Medicaid working groups to stay abreast of reimbursement issues; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits; involved in analysis of Vancomycin pricing decrease and subsequent increase around 1995; also involved in pharmaceutical payment claims processing and pharmaceutical payment management
Hickey	Mareah K.	First Data Bank, Inc.	<p>c/o John Kern Manatt Phelps Phillips, LLP 1111 Bayhill Dr., Suite 300 San Bruno, CA 94066-3053 (650) 812 - 1317</p>	Pricing practices and policies; Abbott's price representations and reporting that were ultimately used by state Medicaid agencies to set payment levels

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Hirschmann	Joseph L.	First Data Bank, Inc.	c/o John Kern Manatt Phelps Phillips, LLP 1111 Bayhill Dr., Suite 300 San Bruno, CA 94066- 3053 (650) 812 - 1317	Pricing practices and policies; Abbott's price representations and reporting that were ultimately used by state Medicaid agencies to set payment levels
Hodgson	Thomas	Abbott Laboratories, Inc. 1991-1998 President	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Operations; Commercial business development; Corporate structure and reporting; Drug pricing including price setting and reporting; Drug payment process
Hoover	John	Technical Director, Division of Management, Center for Medicare and Medicaid Services	7500 Security Blv. Baltimore, MD 21207 Telephone: (410) 786-2020 Contact DOJ Counsel: George Henderson (617) 748-3272	Procedures followed by the States in seeking the FMAP share of Medicaid expenditures; the automated Medicaid Budget and Expenditure System/State Children's Health Insurance Program Budget and Expenditure System (MBES/CBES); the Form CMS-37; the Form CMS-64; the Form CMS-21; summaries of information from Forms CMS-64 as set forth in Financial Management Reports (FMRs); the CMS Form 151
Illinois DHFS				

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IMS Health Incorporated		Consultant	David R. Carlucci Chairman & CEO Contact through: Robert H. Steinfeld, Sr. VP & Gen. Counsel (203) 845-5200 901 Main Avenue, Suite 612 Norwalk, CT 06851	Analysis of market share data for Abbott products, the types of market share data analysis ordered by and relied upon by Abbott, and authentication of Abbott related IMS data and analysis
Indiana FASSA				
Jerry F. Wells, former Florida State Medicaid (and/or another representative)	Jerry F.	formerly of Florida State Medicaid	Jerry F. Wells Home: (850) 926-7275 Fax:(850) 926-2999 Email: JerryFWells@emarqm ail.com Contact Counsel at Florida State AG	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Johnson	Doug	Abbott National Account Manager	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Commercial business development; Accounts management including VHA and Tenet; drug pricing including price setting and reporting; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits
Jones	Mark	Ven-a-Care of the Florida Keys, Inc.	Key West, FL; contact through counsel, Jim Breen	drug pricing including price setting and reporting; drug reimbursement; Ven-a-Care's knowledge of all information underlying and supporting its allegations

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Jones (and/or another representative)	James	Deputy Administrator, Division of Health Care Financing, Wisconsin State Medicaid	James Jones Deputy Administrator Division of Health Care Financing P. O. Box 309 Madison, WI 53701 (608) 266-8922 Contact through counsel: Neil Gebhart Assistant Legal Counsel State of Wisconsin Department of Health and Family Services P.O. Box 7850 Madison, WI 53707	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Kadish	Patty	Abbott, Analyst, Strategic Pricing (also known as Pricing and Contracting)	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers
Kansas HPA				

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Kipperman	Steve	Contract Marketing Manager Alternate Site Product Sales (Hospital Products Division)	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; importance of drug reimbursement and/or AWP information to pharmacies, arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers
Kling	John	General Counsel at Dey Laboratories; Former McGaw General Counsel	2751 Napa Valley Corporate Drive Napa, California 94558	How Defendants determined the prices reported to the state Medicaid programs and the Medicare program; the prices charged to its customers for the pharmaceuticals; communications with the state Medicaid programs and Medicare program; and communications regarding state Medicaid payment and/or Medicare payment for pharmaceutical products to customers

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Kramer (and/or another representative)	Sandy	Pharmacy, Program Specialist, Bureau of Program Policy, Michigan Dept. of Social Services	<p>Sandy Kramer, Pharmacy Program Specialist Bureau of Program Policy Michigan Dept. of Social Services P. O. Box 30037, 400 South Pine Street Lansing, MI 48909 (517) 335-5128</p> <p>To be contacted through: Trish O'Keefe Manager, Pharmacy Services Section Data Management Division Medicaid Program Operations & Quality Assurance Michigan Department of Community Health OKeefeT@michigan.gov Phone: 517.335-5442</p>	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Kreklow	Carla	Abbott Marketing Manager	<p>Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100</p>	Contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Landside	David	Abbott, former Vice President of Government Affairs	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Abbott lobbying activities and Abbott efforts to understand and influence drug reimbursement policies
Lehn	Russ	Abbott, Vice President PPD	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Corporate structure including organization of and relationship between Abbott Laboratories and Abbott Laboratories, Inc; the PPD departments' responsibilities for pricing, sales and marketing including PPD's efforts regarding competitive pricing information; importance of Medicare or Medicaid payment to Abbott drugs; importance of Medicaid payment to customers; drug pricing including price setting and reporting, PPD list prices and PPD communications with Red Book, First Data Bank and Medi-Span; competitor pricing; Drug payment process; arrangement between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits; contracting and marketing including marketing research, sales and customer service

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Leone	Lynn	Hospira Employee	Hospira 275 North Field Drive Lake Forest, IL 224-212-2000	Importance of Medicare or Medicaid payment to Abbott drugs; contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers
Lockwood	John	Ven-a-Care of the Florida Keys, Inc.	Key West, FL; contact through counsel, Jim Breen	drug pricing including price setting and reporting; drug reimbursement; Ven-a-Care's knowledge of all information underlying and supporting its allegations
Louisiana DHH				
Lucas (and/or another representative)	Susan	Washington State Medicaid	Susan Lucas Washington State Medicaid (360) 725-1828 To be contacted through: Dawn Cortez Assistant AG (360) 586-8872	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Lyle	Don	Cardinal Health, Inc	c/o T. Reed Stephens McDermott, Will & Emory Washington, D.C.	Industry practices, including information relating the prices for Defendants' products that are currently and generally available in the market place, reimbursement information importance to wholesalers and pharmacies, as well as AWP and spread related information available to pharmacies via software and other business tools.
Maryland DHMH				

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Mays	Don	GeriMed, Inc.	c/o Harold W. Thomas Thomas, Dodson & Wolford 9200 Shelbyville Road, Suite 611 Louisville, Kentucky 40222-8502 (502) 426 - 1700	Policies and practices of a group purchasing organization; Abbott's sales practices and efforts to market the spread on drugs
McCormick	Brenda	MaineCare - Maine State Medicaid	To be contacted through counsel at Maine Office of the Attorney General	
Mehta	Mukesh R.Ph.	Medical Economics Company, Inc. (formerly owned RedBook)	c/o Thomas J. Cahill Satterlee, Stephens, & Burke 230 Park Avenue New York, New York 10169-0079 (212) 818 - 9200	Pricing practices and policies; Abbott's price representations and reporting that were ultimately used by state Medicare agencies to set payment levels
Milsow	Dennis	McKesson Corporation	c/o Carrie Valiant Epstein, Becker & Green 1227 25th St. NW # 700 Washington, D.C. 20037 (202) 861 - 0900	Industry practices, including information relating the prices for Defendants' products that are currently and generally available in the market place

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Molnar	Dave	Abbott National Accounts Manager PPD	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064- 3500 Telephone: (847) 937- 6100	Commercial business development and accounts management including the contract with Omnicare; contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers
Morgan	Patricia Kay	First Data Bank, Inc.	c/o John Kern Manatt Phelps Phillips, LLP 1111 Bayhill Dr., Suite 300 San Bruno, CA 94066- 3053 (650) 812 - 1317	Pricing practices and policies; Abbott's price representations and reporting that were ultimately used by state Medicaid agencies to set payment levels
Morgan	Kay	Former First Data Bank Editorial Services Pricing manager; Former Abbott Employee Controlled Policies Department	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064- 3500 Telephone: (847) 937- 6100	Contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers
Muller	Patricia J.	First Data Bank, Inc.	c/o John Kern Manatt Phelps Phillips, LLP 1111 Bayhill Dr., Suite 300 San Bruno, CA 94066- 3053 (650) 812 - 1317	Pricing practices and policies; Abbott's price representations and reporting that were ultimately used by state Medicaid agencies to set payment levels

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
National Association of Chain Drug Stores (NACDS)		Industry/Trade Group	Steven C. Anderson 413 N. Lee Street Alexandria, VA 22313 (703) 549-3001	Abbott's membership in and/or financial support of this organization, and analysis, discussion or communications pertaining to price reporting, collection and reliability, communications with federal and state legislatures/legislators, and agencies, training regarding Medicare, Medicaid, AWP, drug payment, and communications related to drug marketing on behalf of manufacturers, such as Abbott.
National Home Infusion Association (NHIA)		Industry/Trade Group	100 Daingerfield Road Alexandria, VA 22314 Contact through counsel: Ralph Caccia Powell Goldstein (202) 624-7353 'rcaccia@pogolaw.com'	Abbott's membership in and/or financial support of this organization, and analysis, discussion or communications pertaining to price reporting, collection and reliability, communications with federal and state legislatures/legislators, and agencies, training regarding Medicare, Medicaid, AWP, drug payment, and communications related to drug marketing on behalf of manufacturers, such as Abbott.
Nebraska DHHS				
New Jersey DHS				
New Mexico HSD				
New York DOH	Woo Pill Hwang			
North Carolina DHHS				
North Dakota DHS				
Nowak	Jim	Abbott employee of apparently captive Abbott contractor	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Data systems and price record keeping

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
O'Keefe (and/or another representative)	Trish M.	Manager, Pharmacy Services Section, Data Management Division, Medicaid Program Operations & Quality Assurance, Michigan Department of Community Health	<p>Trish M. O'Keefe Manager, Pharmacy Services Section Data Management Division Medicaid Program Operations & Quality Assurance Michigan Department of Community Health OKeefeT@michigan.gov Phone: 517.335-5442</p> <p>To be contacted through counsel: Mark Matus Medicaid Fraud Control Unit of Michigan Office of the Attorney General 2860 Eyde Parkway East Lansing, MI 48823 Tel: 517-241-6552 Fax: 517-241-6515 matusm@michigan.gov</p>	Processing of Medicaid claims for payment; reliance and use of reported AWP and/or WAC prices; the state's Medicaid claims data
Ohio DJFS				

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Omnicare			<p>1600 River Center II 100 E. River Center Blvd. Covington, KY 41011</p> <p>Contact through counsel: Eamon O'Kelly (212) 259-6342 Dewy & LeBoeuf, 1301 Avenue of the Americas, New York, NY 10019</p>	Abbott's sales practices and efforts to market the spread on drugs; policies and practices regarding drug purchases and payment
OptionCare, Inc.		Abbott Customer	<p>Kevin Collins, Esq. 485 Half Day Road Suite 300 Buffalo Grove, IL 60089 (847) 465-2577</p>	Abbott's sales practices and efforts to market the spread on drugs; policies and practices regarding drug purchases and payment

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Paccione (and/or another representative)	Maryanne	Virginia State Medicaid	<p>Maryanne Paccione Department of Medical Assistance Services 600 East Main Street Richmond, VA 23219</p> <p>To be contacted through counsel: Lelia Beck Assistant Attorney General Civil Investigation Unit, Medicaid Fraud Control Unit Commonwealth of Virginia Office of the Attorney General 900 East Main Street Richmond, VA 23219 (804) 371-2146</p>	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Palbitska	Lynette	Abbott, Analyst, Strategic Pricing (also known as Pricing and Contracting)	<p>Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100</p>	Contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Pavlik	Chris	Abbott, PPD Sales and/or Sales Manager	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers
Penner (and/or another representative)	Janet E.	AmerisourceBergen Corporation	c/o J. David Bickham, Jr. Vinson & Elkins 2801 Via Fortuna, Suite 100 Austin, TX 78746-7568 (512) 542 - 8570	Interplay and market dynamics between wholesalers and drug manufacturers; process for servicing accounts between manufacturers and customers who have contractual relationships; drug manufacturers responsibility for reported and/or published pricing for their drugs
Pettus	Mickey	Abbott National Accounts Manager, PPD,	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Commercial business development and accounts management including the contract with Omnicare; contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Pharmaceutical Research and Manufacturers of America ("PhRMA")		Industry/Trade Group	<p>950 F Street, N.W. Suite 300, Washington, DC 20004</p> <p>Contact through counsel: Jose Gonzalez Steptoe & Johnson 1330 Connecticut Ave, NW Washington, DC 20036 (202) 429.8110 jrgonzalez@steptoe.c om</p>	Abbott's membership in and/or financial support of this organization, and analysis, discussion or communications pertaining to price reporting, collection and reliability, communications with federal and state legislatures/legislators, and agencies, training regarding Medicare, Medicaid, AWP, drug payment, and communications related to drug marketing on behalf of manufacturers, such as Abbott
Rader	Beth	First Data Bank, Inc.	Genentech, San Francisco (650) 225-1000	Pricing practices and policies; Abbott's price representations and reporting that were ultimately used by state Medicaid agencies to set payment levels
Reed	Larry	Health Insurance Specialist, Center for Medicaid & State Operations, Disabled & Elderly Health Programs Group, Division of Pharmacy	7500 Security Boulevard Baltimore, MD 21244 410-786-3000	Medicaid payment for drugs, including the Medicaid Drug Rebate Program, and federal statutory and regulatory payment requirements

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Reid (and/or another representative)	Robert	Pharmacy Program Administrator, Ohio Department of Jobs and Family Services	<p>Robert Reid Ohio Department of Jobs and Family Services Benefit Management Section 50 West Town Street 4th floor Columbus, OH 43218 (614) 752-4614</p> <p>To be contacted through counsel: Ohio AG State Office Tower 30 E. Broad Street, 17th Floor Columbus, OH 43215-3428 (614) 466-4320</p>	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Rhode Island DHS				
Rhodus (and/or another representative)	Susan	GeriMed, Inc.	<p>Gerimed Corporate Headquarters 9505 Williamsburg Plaza Suite 302 Louisville, KY 40222 (502) 423-0351</p> <p>c/o Harold W. Thomas Thomas, Dodson & Wolford 9200 Shelbyville Road. Suite 611 Louisville, KY 40222-8502 (502) 426 - 1700</p>	Policies and practices of a group purchasing organization; Abbott's sales practices and efforts to market the spread on drugs

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Rite Aid		Abbott Customer	30 Hunter Lane Camp Hill, PA 17011	Abbott's sales practices and efforts to market the spread on drugs; policies and practices regarding drug purchases and payment
Rochelle	Bob	Abbott, Assistant Market Manager PPD	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Contracting and marketing including marketing research, sales and customer service; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including communications with customers
Sellers	Mike	Abbott General Manager Contract Marketing Alternate Site Product Sales	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	The timing and mechanics involved in the formation of Hospira, Inc; the Hospital Products Division departments' responsibilities for pricing, sales and marketing including Hospital Products Division's efforts regarding competitive pricing information; drug pricing including price setting and reporting, Hospital Products Division list prices, and Hospital Products Division procedures for price reporting and Hospital Products Division communications with Red Book, First Data Bank and Medi-Span; drug payment process; communications with Joe Fiske and/or other PPD personnel at Abbott concerning price reductions in 2001 and considerations with respect to the pricing on Erythromycin products
Sharp	Michael	Indiana State Medicaid	To be contacted through Indiana Office of the Attorney General - Medicaid Fraud Control Unit	

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Sibor (and/or another representative)	David	ACS State Healthcare, LLC	<p>Dave Sibor ACS State Healthcare, LLC 260 Franklin St Boston, MA 02110 (617) 423-9845</p> <p>To be contacted through counsel: David Evans, Esq. Hanify & King One Beacon St. Boston, MA 02180 dle@hanify.com</p>	Processing of Medicaid claims for payment; reliance and use of reported AWP and/or WAC prices; the state's Medicaid claims data
Silko	David	McKesson Corporation	<p>c/o Carrie Valiant/ Epstein, Becker & Green, PC 1227 25th St. NW # 700 Washington, D.C. 20037 (202) 861 - 0900</p>	Industry practices, including information relating the prices for Defendants' products that are currently and generally available in the market place

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Solomon (and/or another representative)	Janet	Human Services Program Specialist, Pharmacy, Office of Medical Assistance Programs, Pennsylvania	<p>Janet Solomon Human Services Program Specialist, Pharmacy Office of Medical Assistance Programs 49 Beech Drive Harrisburg, PA 17110-3591 Phone: 717-346-8164 jsolomon@state.pa.us</p> <p>To be contacted through counsel: Pennsylvania Office of Attorney General 16th Floor Strawberry Square Harrisburg, PA 17120 (717) 787-3391</p>	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Stowell	Bruce	Abbott Employee	<p>Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100</p>	Data systems and price record keeping

Last Name/Company Sullivan (and/or another representative)	First Name Leo	Job Title and Business Former TennCare Pharmacy Director	Address & Telephone Number	Subjects of information
			Leo Sullivan Leo Sullivan Consulting, Inc. 101 Overcast Court Murfreesboro, TN 37129 Telephone: (615) 896-3876 Contact Counsel at Tennessee State AG: Peter Kaufman, Esq. (615) 741-3491	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Talley (and/or another representative)	Linda	Formerly with Medi- Span, Inc.	8425 Woodfield Crossing Blvd Indianapolis, IN 46240- 7315 (317) 469 - 5200	Pricing practices and policies; Abbott's price representations and reporting that were ultimately used by state Medicaid agencies to set payment levels
TAP Pharmaceuticals		Abbott Joint Venture	Contact through counsel: Lee Ann Russo Jones Day 77 West Wacker Drive Suite 3500 Chicago, IL 60601- 1692	Abbott's sales practices and efforts to market the spread on drugs; Abbott's knowledge and participation in spread marketing at TAP and general compliance efforts as well as compliance related to the TAP criminal plea, civil settlement and CIA; Abbott's control of TAP
Tennessee BT				

Last Name/Company Terrebonne (and/or another representative)	First Name Mary Julia	Job Title and Business Pharmacy Director Louisiana State Medicaid	Address & Telephone Number Mary Julia Terrebonne Pharmacy Director Louisiana Medicaid Pharmacy Benefit Program 628 N. Fourth Street Baton Rouge, LA 70802	Subjects of information Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
			Contact Counsel at Louisiana AG Medicaid Fraud Control Unit: Fred Duhy 1885 North 3rd Street Baton Rouge, LA 70802 P.O. Box 94005 Baton Rouge, LA 70804 (225) 326-6210	
Tobiason	Virginia	Abbott Director of Corporate payment and Health Policy	Home address: 1695 Second Street Highland Park, IL	Operations of Hospital Products Division, Home Infusion Services; Contracting and marketing including marketing research, sales and customer service; Drug pricing including price setting and reporting and communications with customers; Drug payment process and involved in the management of drug payment claims processing for providers which generated revenues which Abbott shared with the providers; Arrangements between Defendants and wholesalers including discounting, chargeback's, rebates, free goods and credits including communications with customers

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Tomlinson (and/or another representative)	Bryan	Virginia State Medicaid	Department of Medical Assistance Services 600 East Main Street Richmond, VA 23219	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
			To be contacted through Counsel at Virginia State AG: Lelia Beck Assistant Attorney General Civil Investigation Unit, Medicaid Fraud Control Unit Commonwealth of Virginia Office of the Attorney General 900 East Main Street Richmond, VA 23219 (804) 371-2146 (804) 786-0807 - facsimile	
Tootell	Mike	Abbott, former Reimbursement Manager	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	Drug pricing including price setting and reporting and communications of such to price publishing companies and customers; Drug payment process and government drug reimbursement

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Ultracare, Inc.		Abbott Customer	2001 Janice Avenue Melrose Park, IL 60160 Contact through counsel: Troy Brown Morgan Lewis & Brockius LLP (215) 963-5214	Abbott's sales practices and efforts to market the spread on drugs; policies and practices regarding drug purchases and payment
Virginia DMAS Walgreen		Abbott Customer	Corporate Headquarters Walgreen 200 Millmot Road Deerfield, IL 60015	Abbott's sales practices and efforts to market the spread on drugs; policies and practices regarding drug purchases and payment
Walker	Dennis	Abbott Manager of National Account	Contact through counsel: Dave Stetler dstetler@ststlerandduf fy.com 312/338-0202 11 S. La Salle, Ste 1200 Chicago, IL 60603	Commercial business development; Accounts management including GeriMed and Optioncare; contracting and marketing including marketing research, sales and customer service; importance of relative payment mechanisms to Abbott customers, specifically including the customers of Alternate Site Product Sales; marketing directly to Ven-A-Care of the Florida Keys, Inc; drug pricing including price setting and reporting and communications with customers; drug payment process; arrangements between Defendants and wholesalers including discounting, chargebacks, rebates, free goods and credits including
Wal-mart		Abbott Customer	702 Southwest Eighth Street Bentonville, AR 72716	Abbott's sales practices and efforts to market the spread on drugs; policies and practices regarding drug purchases and payment

Last Name/Company	First Name	Job Title and Business	Address & Telephone Number	Subjects of information
Walsh	Jude	Governor's Office of Health Policy and Finance - Maine State Medicaid	To be contacted through counsel at Maine Office of the Attorney General	
Washington DSHS		New Jersey Div. of Medical Assistance and Health Services, Administrator	To be contacted through counsel at New Jersey Office of the Attorney General	
Waugh	Barbara	North Carolina Div. of Medical Assistance, Pharmacy Supervisor	To be contacted through counsel at North Carolina Office of the Attorney General	
Weeks	Lisa			
White	Miles	Abbott	Corporate Headquarters Abbott Laboratories 100 Abbott Park Road Abbott Park, IL 60064-3500 Telephone: (847) 937-6100	The circumstances surrounding Abbott's receipt of the October 31, 2000 Congressman Stark letter and Abbott's subsequent price change decision on the subject drugs
Woods (and/or another representative)	Amy	Missouri State Medicaid	Amy Woods (573) 751-6961 To be contacted through counsel at Missouri State AG's Office: Richard Williams (573) 751-8790	Medicaid payment for drugs, statutes, regulations, rules, policies and practices governing payment, use of or reliance upon AWP or WAC, Abbott's drug price representations and reporting that were used by state Medicaid agencies to set payment levels
Wyoming DH				